

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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AMPEX CORPORATION, )  
                          )  
                          )  
*Plaintiff,*       )  
                          )  
                          )  
v.                     )       C.A. No. 04-1373 (KAJ)  
                          )  
                          )  
EASTMAN KODAK COMPANY, )  
ALTEK CORPORATION, and )  
CHINON INDUSTRIES, INC., )  
  
*Defendants.*

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**NOTICE OF DEPOSITION OF NICO CHEN**

Please take notice that Plaintiff Ampex Corporation (“Ampex”) will take the deposition upon oral examination of Nico Chen, pursuant to Rule 30 of the Federal Rules of Civil Procedure. The deposition will be held at the Ambassador Hotel, 188, Chung Hwa Road, Section 2, Hsinchu 300, Taiwan, commencing on or about February 23, 2006, at 9:00 a.m. or at such other date, time and place as mutually agreed upon by counsel, and ending on or about February 23, 2006, at 5:30 p.m., or until completed.

This examination will be taken before a Notary Public or other person authorized to administer oaths and will be recorded stenographically and/or by video and shall continue from day to day until completed. Testimony derived pursuant to this Notice of Deposition shall be used for any and all appropriate purposes permitted by the Federal Rules of Civil Procedure.

You are invited to attend.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Julia Heaney (#3052)

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January 25, 2006

**CERTIFICATE OF SERVICE**

I, Julia Heaney, hereby certify that on January 25, 2006, I caused to be electronically filed the foregoing *Notice of Deposition of Nico Chen* with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

Paul M. Lukoff, Esquire  
David E. Brand, Esquire  
Prickett, Jones & Elliott, P.A.

and that I caused copies to be served upon the following in the manner indicated:

**BY HAND**

Paul M. Lukoff, Esquire  
Prickett, Jones, Elliott,  
1310 King Street  
Wilmington, DE 19899

**BY FEDERAL EXPRESS**

Michael J. Summersgill, Esquire  
Wilmer Cutler Pickering Hale and Dorr LLP  
60 State Street  
Boston, MA 02109

/s/ Julia Heaney  
Julia Heaney (#3052)